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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of )  
Amateur radio ) PR Docket 93-305  
vanity callsigns )  
)

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Submitted by:

FCC MAIL ROOM

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On: 1 Feb 1994

Follows my comments on the subject NPRM regarding amateur radio vanity call signs. I have been an amateur radio operator for 31 years and an Extra Class license holder since 1968. I was able to get my present call the last time that call signs could be selected (1977) and have been disappointed that that option has not existed since then.

First, let me say that I am extremely pleased that you are proposing this program. My comments are both philosophical and implementation oriented, but the overall program looks great!

GENERAL COMMENTS

1. I suggest using a different term than "vanity" call signs. This term brings with it some negative connotations which, I believe, might diminish the enthusiasm for the program. I would favor a more general term like the "Call Sign Selection System" or "Specific Call Sign Selection Program."
2. I would like to see each ham have a call sign that indicates his/her class of license. Since the mechanism is in place for a specific pattern of call signs per class of license, let's use it. This could apply immediately to requests for specific calls, and eventually to everyone upon renewal of their present license.
3. I would like to see hams returned to having call signs that are reflective of their call district, i.e. if you move, modify. Again, this could start with the specific call sign selection program, and eventually to everyone upon renewal.
4. Anyone in any class of license should be able to buy a specific call (if available), subject to its being appropriate to the operator's class of license. Initially, length of time in a given license class should be the primary determining factor for who can apply first for a given call sign. Note that I did NOT say length of time being an amateur radio operator. One might also consider letting the Extra Class license holders go first, but that may not be necessary.

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5. Some specific call signs should be reserved for radio clubs (e.g. deceased members), descendants of deceased amateurs who are also hams, and calls formerly held by an individual. Perhaps these can be factored into the priority scheme suggested in 4. above.

6. Make a specific provision for Special Event callsigns. A bonifide "big" event, like the Boy Scouts Jamboree, the Olympics or whatever, should be allowed to select ANY available callsign that is allowable in the U.S. callsign allocations, even if its pattern might not be "standard." For example, allow the issuance of a call like W1A, or NA6ZZZ, or even W7ABCD.

7. \$70 for a 10 year license is certainly reasonable. If it could be done legally, I suggest the FCC could make some real money by auctioning certain callsigns. I would bet that someone would be willing to pay \$1000 for W6DX, for example. But I suppose that would be discriminatory.

8. After you get this initial program going, I strongly suggest you start back-filling calls for new licensees. All new Group C licensees, for example, should be able to get 1x3 calls, even if all the N#XXXs are gone. Start backfilling with available K, N, and W 1x3s. Offer anyone who is eligible for a Group C 1x3 but who has a 2x3 the opportunity to get a 1x3 call for a very nominal fee, or the regular fee if a person wants a specific call.

#### SPECIFIC COMMENTS ON THE NPRM

1. Section II, 2nd sentence--see my general comment 2 above. The callsign can and should indicate operating privileges in order to help amateur radio self-police more effectively.

2. Section III, para 6--I suggest you provide a single on-line terminal to the ARRL and let them keep track of available callsigns. They in turn can post requested information on ham radio computer bulletin boards and/or mail lists of available calls to interested parties as they did in 1976/77. Since the ARRL essentially administers the ham radio licensing program, via the VECs, they can certainly handle callsign database information requests.

3. Section III, para 7--is the system that you're installing being designed with bulletin board/e-mail access in mind? Very inexpensive software exists today for computer bulletin boards and it seems that such programs could be used to provide remote links into your system very inexpensively.

4. Appendix, para 3 (f), Section 97.19--I would suggest that a vacated callsign also be subject to the two year exclusion that is indicated for expired calls and those of deceased hams. Especially for active hams, it would take quite a while for various parts of the "system" to catch up with who the "new" W6AA (or whatever) is. Examples are QSL bureaus, magazine subscriptions, databases maintained by retail stores, etc.

#### SUMMARY

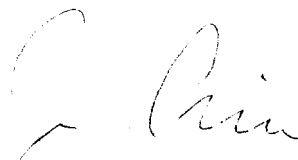
My suggested philosophy for callsign assignment/selection is that we abide by two general rules:

- when you upgrade, you get a new call, and
- when you change call districts, you get a new call.

Thus the ultimate callsign structure would achieve what I believe are two desirable goals:

- everyone eventually would have a call that indicates operating privileges, and
- everyone eventually would have a call that reflects where they live.

Many of today's hams no doubt would want to be grandfathered/ mothered to keep their present calls, and that's fine. But if a new callsign system is to be implemented, then let's do it with a 50-year view of what the callsign structure should be.



Jim Price, K6ZH